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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA :  
 :  
 v. : **CRIMINAL COMPLAINT**  
 :  
 BOBBY DAWSON : Mag. No. 13-8205 (MCA)  
 :

I, Douglas Man, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B

Continued on the attached page and made a part hereof.



Special Agent Douglas Man  
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,  
May 29, 2013 in Newark, New Jersey

HON. MADELINE COX ARLEO  
UNITED STATES MAGISTRATE JUDGE

  
Signature of Judicial Officer

**ATTACHMENT A**

**Count One – Hobbs Act Robbery**

On or about April 17, 2013, in Essex County, in the District of New Jersey and elsewhere, defendant,

BOBBY DAWSON,

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce and the movement of articles and commodities in commerce by robbery as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that the defendant did unlawfully take and obtain personal property consisting of United States currency from the person of and in the presence of an employee of the Belleville News and Food store, against his will, by means of actual and threatened force, violence, fear of injury, immediate and future, to his person and property, and property in his custody and possession.

In violation of Title 18, United States Code, Section 1951(a).

**Count Two – Use of a Firearm in Furtherance of a Crime of Violence**

On or about April 17, 2013, in Essex County, in the District of New Jersey and elsewhere, defendant,

BOBBY DAWSON,

during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, specifically, the Hobbs Act robbery set forth in Count One, did knowingly use, carry, and, in furtherance of such crime, possess a firearm, which was brandished.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

## **ATTACHMENT B**

I, Douglas Man, am a Special Agent with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. On or about April 17, 2013, at approximately 1:53 p.m., a male entered the Belleville News and Food store located at 111 Newark Avenue in Belleville, New Jersey, armed with a handgun and with a mask covering his face. The robber told the store clerk not to move or he was going to shoot. The robber pointed his firearm at the store clerk's head and demanded money from the store's cash registers. The store clerk complied. The robber placed approximately \$2,000 from the store's cash registers in a bag he was carrying, and then fled.

2. The store's surveillance video captured the robbery. The surveillance video shows that, before exiting the store, the robber removed his mask, revealing the robber's dark complexion and a goatee or a mustache on the robber's face.

3. The store's surveillance video from the previous day, April 16, 2013, shows a male resembling the robber conducting reconnaissance inside the store. The male captured on the store's surveillance video from that day has been identified as defendant BOBBY DAWSON.

4. Surveillance video taken by a neighboring property at the time of the robbery shows that the robber drove to the area of the store in a dark colored, four-door sedan that is missing a hubcap on its right rear tire. Surveillance video taken the previous day shows defendant BOBBY DAWSON driving to the area of the store in the same car.

5. An associate of defendant BOBBY DAWSON rented a black Toyota Camry four-door sedan from a rental car company from on or about April 9, 2013 to on or about April 22, 2013. The car rented by defendant BOBBY DAWSON's associate was missing a hubcap on its right rear tire.

6. At all times relevant to this Complaint, the Belleville News and Food store was a commercial establishment engaged in selling food and other items that moved in, were transferred in, and affected interstate commerce.